

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ROBERT TAYLOR  
P.O. BOX 12524  
PHILADELPHIA , PA, 19151**

**Plaintiff/Petitioner**

**v.**

**CASE NO.  
CIVIL ACTION NO: D-PAE-2-17-CV-003369-001  
AND  
CASE NO.  
WRIT OF  
HABEAS CORPUS NO. D-PAE-2-17-CV-003368-001**

**THE COMMONWEALTH  
OF PENNSYLVANIA  
COMMONWEALTH OF  
PENNSYLVANIA DISTRICT  
ATTORNEYS OFFICE  
3 s. PENN SQUARE  
PHILADELPHIA , PA ,19107**

**MOTION TO THE COURT**

**FILED SEP 27 2017**

**THE COMMONWEALTH COURT  
PHILADELPHIA CRIMINAL  
JUSTICE CENTER (CJC)  
1301 FILBERT STREET  
PHILADELPHIA, PA, 19107**

**AND  
CURRENT OFFICIAL  
JUDGE FRANK PALUMBO**

**THE CITY OF PHILADELPHIA  
C/O CITY OF PHILADELPHIA  
LAW DEPARTMENT  
1515 ARCH STREET, 14<sup>TH</sup> FLOOR  
PHILADELPHIA, PA, 19102**

**AND  
CURRENTLY CITY OF PHILADELPHIA  
POLICE OFFICER OBRIEN #7461  
AND UNNAMED AND UNKNOWN  
CITY OF PHILADELPHIA POLICE  
OFFICERS**

**COMPLAINT/PETITION  
JURISDICTION**

**1. Jurisdiction Has Been Established  
In Aforementioned Complaint/Petition  
Case Number(s) In Caption Above.  
This Motion Is Under Rules 3,4 (a) (1),  
(b) (c) (3) And 7 (b) (1) Of The Federal  
Rules Of Civil Procedure.**

THE PHILADELPHIA PRISON SYSTEM/  
DEPARTMENT OF PRISONS  
CURRAN-FROMHOLD  
CORRECTIONAL FACILITY (CFCF)  
7901 STATE ROAD  
PHILADELPHIA, PA, 19136  
AND  
CURRENTLY WARDEN GERALD MAY  
AND PRISON OFFICIALS SGT.  
LEBESCO AND C/O A. SMITH

THE PHILADELPHIA SHERIFFS OFFICE  
LAND TITLE BUILDING  
100 S. BROAD STREET  
PHILADELPHIA, PA, 19110

THE PHILADELPHIA PUBLIC DEFENDERS  
ASSOCIATION  
1441 SAMSON STREET  
PHILADELPHIA, PA, 19102  
AND  
CURRENTLY PUBLIC DEFENDER  
CHRIS ANGELO

Defendant (s)

2. Plaintiff/Petitioner Brings Motion For Reissuance Of Summons Regarding His Action. As Well As Any Other Response And Instructions By The Court. This Is In Follow up To Previous Request For Reissuance Of Summons Submitted August 7, 2017. Sent On/Around August 9, 2017 To The Court.

3. On August 5, 2017 Plaintiff/Petitioner Received Mail Regarding His Case (s) From Office Of The Clerk U.S. District Court Eastern District Of Pennsylvania. Dated August 2, 2017 Which He Was Not Able To Verify Or Retain Due To Mail Tampering. Envelope Had Not Been Sealed And Was Taped Together.

4. Plaintiff/Petitioner Brought Immediate Notice To Post Office/Service Of His Mail. Officials Noted Damage And Took Mail For Immediate Return Back To The Court. There Was Also a Follow up To The Postal Inspection Service. Case No. CA134 282055 Regarding This Incident.

5. In Reference To Paragraphs 1-4 Above See Exhibit (A)

6. Plaintiff/Petitioner Since Has Not Had Response To His Summons Request Or Confirmation That The Previous Mail Dated August 2, 2017 Was Ever Returned Back To The Court.

7. Which Has Brought Forth This Motion. As Plaintiff/Petitioner Requires Issuance Of Summons To Continue The Process Of His Action. BOWLES v. DIXIE CAB ASS'N 113 F.SUPP. 324 (D.C. 1953). And Further Bring Forth The Facts Before The Court For Justice.

8. WHEREFORE, Plaintiff/Petitioner Request The Following:

a. Reissuance Of Summons.

b. Such Other Issuances Or Documents That May Have Been Sent By The Court.

RESPECTFULLY SUBMITTED

SEPTEMBER 26, 2017  
DATE

Robert Taylor  
ROBERT TAYLOR  
P.O. BOX 12524  
PHILADELPHIA, PA, 19151

BY THE COURT

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# EXHIBIT

(A)

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT TAYLOR  
P.O. BOX 12524  
PHILADELPHIA, PA, 19151

CASE NO. – CIVIL: D-PAE-2-17-CV-003369-001  
WRIT OF HABEAS CORPUS: D-PAE-  
2-17-CV-003368-001

Plaintiff/Petitioner in above caption filed civil lawsuit submitted July 26, 2017. Received by The Court July 28, 2017 while awaiting response on August 5, 2017 he received mail from office of clerk U.S. District Court Eastern District of Pennsylvania dated August 2, 2017 with numbers 02 1W 0001388268. Zip 19106-9865 Plaintiff/Petitioner could not get court response or verify what was contained in mail the envelope was not sealed and had been taped up appearing to be tampered with. Plaintiff/Petitioner immediately took mail to postal service officials attention who was unable to explain it and called for supervisor. After being brought this problem he only advised a mail fraud tampering claim could be done. The envelope was stamped received in damaged condition and was scheduled to be sent back. Due to this he has not gotten response of filing and action by THE COURT. Plaintiff/Petitioner urgently requests that confirmation and action regarding his filing be sent or resent by secure carrier from THE COURT to ensure proper reception or such other as THE COURT deems necessary.

August 7, 2017  
DATE

Robert Taylor  
ROBERT TAYLOR

7016 1370 0001 7778 9084

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit [usps.com/certified](http://usps.com/certified)

PHILADELPHIA, PA 19106

0124 26

Base Rate \$3.35  
 Postage and Fees \$0.00  
 Return Receipt Electronic® \$0.00  
 Certified Mail Restricted Delivery® \$0.00  
 Signature Required® \$0.00  
 Total \$6.65

Postage and Fees \$10.00

08/08/2017

See Reverse for Instructions

FRANK FORD  
 4410 PAUL ST  
 PHILADELPHIA  
 PA  
 19124-9998  
 4165660124  
 (800)275-8777 9:51 AM  
 08/08/2017

| Product Description | Sale Qty | Final Price |
|---------------------|----------|-------------|
|---------------------|----------|-------------|

|   |   |        |
|---|---|--------|
| PM 1-Day Window FR Env (Domestic) (PHILADELPHIA, PA 19106) (Flat Rate) (Expected Delivery Day) (Wednesday 08/09/2017) | 1 | \$6.65 |
|---|---|--------|

Certified Mail®  
 (USPS Certified Mail #)  
 (70161370000177789084)

Total \$10.00

Cash \$10.00

Includes up to \$500 insurance

\*\*\*\*\*  
 BRIGHTEN SOMEONE'S MAILBOX. Greeting cards available for purchase at select Post Offices.  
 \*\*\*\*\*

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\*\*\*\*\*  
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 Thank you for your business

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<https://postalexperience.com/Pos>

840-5190-0114-003-00010-07607-02

or scan this code with your mobile device:

PSN 1000

VERIFICATION

IN COMPLIANCE PURSUANT TO 28 U.S.C. § 1746 – UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY.

I verify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or verify under penalty of perjury that the foregoing document is true and correct."

Executed on

SEPTEMBER 26, 2017

Robert Taylor

DATE

ROBERT TAYLOR

CERTIFICATE

IN COMPLIANCE PURSUANT TO 28 U.S.C. s 1746 – UNSWORN  
DECLARATIONS UNDER PENALTY OF PERJURY.

I certify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or certify under penalty of perjury that the foregoing is true and correct.

Executed on

SEPTEMBER 26, 2017

Robert Taylor

DATE

ROBERT TAYLOR



**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**FILED STAMP COPY REQUEST: Plaintiff/Petitioner Request a Filed Stamp Copy Of This Motion For Return By The Court. For This Plaintiff/Petitioner Has Sent An Enclosed Money Order, Additional Copies, And a Self Addressed Adhesive Seal Envelope.**

SEPTEMBER 26, 2017  
DATE

Robert Taylor  
ROBERT TAYLOR

for the

Plaintiff(s)

Civil Action No.

## SUMMONS IN A CIVIL ACTION

A lawsuit has been filed against you.

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: \_\_\_\_\_

Signature of Clerk or Deputy Clerk